

cc: DAE ORIGINAL

EDWARD H. KUBO, JR. #2499
United States Attorney
District of Hawaii

WILLIAM L. SHIPLEY
Assistant U.S. Attorney
Room 6100, PJKK Federal Building
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-2958
E-mail: William.Shipley@usdoj.gov

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 21 2007
at 3 o'clock and 55 P M
SUE BEITIA, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CIV. NO. 06-00629 DAE/LEK
)	CR. NO. 04-00322 DAE
)	CR. NO. 05-00049 DAE
Plaintiff,)	
)	MOTION FOR ORDER FINDING
vs.)	WAIVER OF ATTORNEY-CLIENT
)	PRIVILEGE WITH RESPECT TO
ABRAHAM NGUYEN MARTIN,)	DEFENDANT'S MOTION UNDER
)	28 U.S.C. § 2255 TO VACATE,
Defendant.)	SET ASIDE, OR CORRECT
)	SENTENCE BY A PERSON IN
)	FEDERAL CUSTODY; MEMORANDUM
)	OF LAW; DECLARATION OF
)	COUNSEL; PROPOSED ORDER;
)	CERTIFICATE OF SERVICE

MOTION FOR ORDER FINDING WAIVER OF
ATTORNEY-CLIENT PRIVILEGE WITH RESPECT TO DEFENDANT'S
MOTION UNDER 28 U.S.C. § 2255 TO VACATE, SET ASIDE,
OR CORRECT SENTENCE BY A PERSON IN FEDERAL CUSTODY

The United States of America, by its undersigned
counsel, hereby moves this Court to issue the appended proposed
Order Finding Waiver of Attorney-Client Privilege with Respect to

Defendant's Motion Under 28 U.S.C. § 2255 to Vacate, Set Aside, or Correct Sentence by a Person in Federal Custody.

This motion is based upon the appended Memorandum of Law and Declaration of Counsel, and the record and files of this action, and the underlying criminal proceeding.

DATED: 3/21/07, 2007, at Honolulu, Hawaii.

Respectfully submitted,

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By



WILLIAM L. SHIPLEY
Assistant U.S. Attorney